



LATHAM & WATKINS^{LLP}

MORRISON & FOERSTER

January 27, 2025

VIA ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

Re: *The New York Times Company v. Microsoft Corporation, et al.* (1:23-cv-11195-SHS-OTW) - Oral Argument Request

Dear Judge Stein:

On behalf of Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC (together, the “OpenAI Defendants”), we write pursuant to Rule 2.F. of Your Honor’s Individual Practices to request that oral argument be held with respect to the OpenAI Defendants’ Objection to Magistrate Judge Wang’s November 22, 2024 non-dispositive order pursuant to Federal Rule of Civil Procedure 72(a), ECF No. 362.

Thank you for your consideration.

Respectfully submitted,

KEKER, VAN NEST &
PETERS LLP*

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/s/ Andrew F. Dawson
Andrew F. Dawson

/s/ Elana Nightingale Dawson
Elana Nightingale Dawson

/s/ Joseph C. Gratz
Joseph C. Gratz

cc: All Counsel of Record (via ECF)

* All parties whose electronic signatures are included herein have consented to the filing of this document.